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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CLAIRE BLANCHARD,

Plaintiff,

vs.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

) Case No.: 3:14-cv-03143-VC

)
) STIPULATION AND ~~PROPOSED~~ ORDER
) FOR AN EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended for 45 days or from December 29, 2014 until February 12, 2015. This is Defendant's first request for an extension of time to respond to Plaintiff's motion. Defense counsel needs additional time to properly address the issues raised in Plaintiff's Motion for Summary Judgment due to pre-approved leave as well as a heavy workload, despite due diligence.

1 The parties further stipulate that the remaining dates in the Court's Scheduling Order
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: December 19, 2014

/s/ Lynn M. Harada for Mary A. Gilg*
(*as authorized via email on 12/19/14)
MARY A. GILG
Attorney for Plaintiff

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10 Dated: December 19, 2014

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14 By: /s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant U.S. Attorney

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16 Attorneys for Defendant

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19 ORDER:

20 APPROVED AND SO ORDERED:

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22 Dated: December 23, 2014



THE HONORABLE VINCE CHHABRIA
United States District Judge